

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: Angel Medina aka	:	CHAPTER 13
Angel L. Medina aka Angel M. Medina	:	
Shari Medina aka Shari Wahnon	:	NO. 16-04599 RNO
Debtor(s)	:	
	:	
Lakeview Loan Servicing, LLC	:	
Movant	:	
	:	
vs.	:	
	:	
Angel Medina aka Angel L. Medina	:	11 U.S.C. Section 362
aka Angel M. Medina	:	
Shari Medina aka Shari Wahnon	:	
Debtor(s)	:	
	:	
Charles J. DeHart, III Esq.	:	
Trustee	:	

Debtors' Response to the Motion Of Lakeview Loan Servicing, Llc For Relief From The
Automatic Stay Under Section 362

1. Admitted.
2. Debtor(s) admit they are the owner(s) of the premises 110 Cross Ln, Greentown, PA 18426, and deny the balance of this averment.
3. Admitted.
4. Debtors deny that Movant is a holder in due course with any rights.
5. Debtors deny that mortgage foreclosure proceedings commenced and/or continued which are stayed by the filing of a Chapter 13 Petition in Bankruptcy by the Debtors.
6. Debtors deny the contents of this averment.
7. Debtors deny the contents of this averment.
8. Debtors deny that Movant has established any grounds for such relief.
9. Debtors deny that the instant motion of Movant and the averments contained therein do not

constitute a waiver by Movant.

WHEREFORE, Debtor humbly prays the Honourable Court for an Order denying Movant's request for relief and any other relief that this Honourable Court deems equitable and just.

Respectfully submitted,

s/ Mark E. Moulton

Mark E. Moulton, Esquire, ID #89064

Attorney for Debtor

693 State Route 739, Suite #1

Lords Valley, PA 18428

570-775-9525

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Trustee	:	

ORDER

AND NOW, this day of February, 2020, the matter having come before the Honourable Court on the Movant's request for Relief, the response thereto and any hearing thereon the Motion of Lakeview Loan Servicing, LLC is hereby DENIED.

BY THE HONOURABLE COURT

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Trustee	:	

CERTIFICATE OF SERVICE

I, Mark E. Moulton, attorney for Debtors, hereby certify that I have filed the Debtors' Response to the Motion for Relief from Stay, and Proposed Order electronically and they are available for viewing on-line.

Dated: February 14, 2020

/s/ Mark E. Moulton

Mark E. Moulton